## UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Alexandria Division

M CORP DBA 11:59,

Civil Action: 1:24-cv-01823

Plaintiff.

v.

SUPPLEMENTAL CERTIFICATION OF

INFINITIVE, INC., JOSEPH

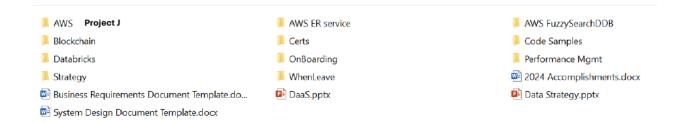
BRADLEY SHERIDAN, AND DOES 1-25, INCLUSIVE.

Defendants.

STACY LANDAU, ESQ. IN FURTHER SUPPORT OF ORDER TO SHOW CAUSE AND TEMPORARY RESTRAINING **ORDER** 

I, STACY LANDAU, hereby certify as follows:

- I am an attorney at law of the State of New Jersey and Counsel with the law firm of Nukk-Freeman & Cerra, P.C., counsel for M Corp dba 11:59 ("Plaintiff" and/or "11:59")
- 2. I submit this certification in further support of 11:59's application for a preliminary injunction and temporary restraining order against 11:59's former employee, Defendant Joseph Bradley Sheridan ("Sheridan"), and Sheridan's new employer Infinitive, Inc. ("Infinitive") (collectively "Defendants"). I am fully familiar with the facts set forth herein.
- 3. On Monday, October 14, 2024, at 3:29 p.m., I received an iManage Share notification providing a link to a folder named "Google Drive Files." Defendant Sheridan's attorneys purported the "Google Drive Files" link would permit access to a password protected folder containing 11:59's confidential information that Sheridan stored or accessed in his personal Google Drive after his resignation from 11:59.
- 4. Shortly thereafter, through the link provided, we were able to access and download the "Google Drive Files" in the form of a Zip file. The Zip file contained approximately 3.94 Gigabytes of data comprised of the following folder and file listing:



- By the next morning, on Tuesday, October 15, 2024, this office provided the "Google Drive Files" Zip file via secure link to Maragell for analysis.
- On October 15, 2024, this office caused to be filed a Verified Complaint and Order to Show Cause seeking Temporary Restraints and supporting documents.
- 7. Without divulging attorney client privileged or work product privileged information, 11:59 did not discover the significant information it now submits prior to the filing of its Verified Complaint and Order to Show Cause.

I certify that the foregoing statements made by me are true and correct to the best of my knowledge. I am aware that if any of the foregoing statements are willfully false, I am subject to punishment.

NUKK-FREEMAN & CERRA, P.C. Attorneys for Plaintiff M Corp dba 11:59

Slacy Landan

By:

STACY LANDAU, ESQ. (*To be admitted Pro Hac Vice*) 26 Main Street, Suite 202 Chatham, New Jersey 07928

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Dated: October 28, 2024